

# **Exhibit 4**



Sanjay Karnik  
[Sanjay@AminTalati.com](mailto:Sanjay@AminTalati.com)

312.327.3327 Tel  
312.884.7352 Fax

May 27, 2016

Mr. Jack Fitzgerald  
The Law Office of Jack Fitzgerald, PC  
Hillcrest Professional Building  
3636 Fourth Avenue, Suite 202  
San Diego, California 92103

Mr. Paul Joseph  
The Law Office of Paul K. Joseph, PC  
4125 W. Pt. Loma Blvd. No. 206  
San Diego, CA 92110

Re: *Jones v. Nutiva, Inc.*, No. 16-cv-711-HSG (N.D. Cal.)  
**Letter re. Notice of Depositions for Elizabeth Kaplan and Neil Blomquist**

Dear Counsel:

I write in regard to the Notice of Depositions for Elizabeth Kaplan and Neil Blomquist. For several reasons, Nutiva objects to the notices and does not agree to the depositions going forward as noticed. First, there is no reason for such depositions to proceed until after the Court has had the opportunity to rule on the pending motion for judgment on the pleadings, and has had the opportunity to issue a case management schedule, including determining whether discovery will be bifurcated in this case. Your attempts to notice these depositions, unilaterally, before the Court's rulings on these matters is disproportionate to any legitimate need in this case at this time. Furthermore, Nutiva's counsel in this action is not available on the date noticed.

Second, as I previously advised you, Ms. Kaplan is not a Nutiva employee. Following the Court's rulings on the above-referenced matters, if you would like to discuss with me whether Nutiva could help facilitate her appearance at a deposition, please let me know.

Sincerely,

/s/ Sanjay S. Karnik

cc (via email):

*jack@jackfitzgeraldlaw.com*  
*trevor@jackfitzgeraldlaw.com*  
*melanie@jackfitzgeraldlaw.com*

---

May 27, 2016  
Page 2

*paul@pauljosephlaw.com*  
*rakesh@amintalati.com*  
*ryan@amintalati.com*  
*wcole@calljensen.com*  
*morr@calljensen.com*